



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 11, 2018

By ECF and Email

A. Eduardo Balarezo, Esq.
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Washington, D.C. 20004

William B. Purpura
8 East Mulberry Street
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Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

Pursuant to Federal Rule of Criminal Procedure 7(f), the government hereby provides you with a bill of particulars specifying additional violations that it intends to prove at trial, which were part of the defendant's continuing series of violations of Title 21, United States Code, Sections 841(a), 846, 959(a) and 960(a) set forth in Count One of the Fourth Superseding Indictment (the "Indictment") in the above-captioned case. The government has provided the defendant with discovery related to each narcotics transaction set forth below.

Violation Eighty-Six
(International Cocaine Distribution with the Norte del Valle Cartel)

Violation Number	Approx. Date(s) of Offense	Approx. Amount of Controlled Substance(s)	Statutes
86	April 21, 1993	7,300 Kilograms of Cocaine	21 U.S.C. §§ 959(a), 959(c), 960(a)(3), 960(b)(1)(B)(ii); 18 U.S.C. § 2

Violations Eighty-Seven Through Eighty-Eight
(International Cocaine Distribution with the Cifuentes-Villa Organization)

Violation Number	Approx. Date(s) of Offense	Approx. Amount of Controlled Substance(s)	Statutes
87	Oct. 1-9, 2009	8,300 Kilograms of Cocaine	21 U.S.C. §§ 959(a), 959(c), 960(a)(3), 960(b)(1)(B)(ii); 18 U.S.C. § 2
88	Feb. 6-7, 2009	7,500 Kilograms of Cocaine	21 U.S.C. §§ 959(a), 959(c), 960(a)(3), 960(b)(1)(B)(ii); 18 U.S.C. § 2

Violations Eighty-Nine Through Ninety
(International Cocaine Distribution with Other South American Suppliers)

Violation Number	Approx. Date(s) of Offense	Approx. Amount of Controlled Substance(s)	Statutes
89	Jan. 30, 2014	403 Kilograms of Cocaine	21 U.S.C. §§ 959(a), 959(c), 960(a)(3), 960(b)(1)(B)(ii); 18 U.S.C. § 2
90	Oct. 30, 2007	23,562 Kilograms of Cocaine	21 U.S.C. §§ 959(a), 959(c), 960(a)(3), 960(b)(1)(B)(ii); 18 U.S.C. § 2

Violations Ninety-One Through Ninety-Five
(Cocaine, Heroin and Marijuana Distribution)

Violation Number	Approx. Date(s) of Offense	Jurisdiction	Approx. Amount of Controlled Substance(s)	Statutes
91	Jan. 15, 2012	Central District of California	409 Kilograms of Marijuana	21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vii); 18 U.S.C. § 2
92	July 14-15, 2009	District of New Jersey	84 Kilograms of Cocaine; 75 Kilograms of Heroin	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II); 18 U.S.C. § 2

Violation Number	Approx. Date(s) of Offense	Jurisdiction	Approx. Amount of Controlled Substance(s)	Statutes
93	Nov. 13, 2008	Northern District of Illinois	20 Kilograms of Heroin	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(i); 18 U.S.C. § 2
94	Dec. 27, 2007	Southern District of New York	120 Kilograms of Cocaine	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii)(II); 18 U.S.C. § 2
95	May 11, 1990	District of Arizona	926 Kilograms of Cocaine	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii)(II); 18 U.S.C. § 2

The government reserves the right to amend this bill of particulars. See Fed. R. Crim. P. 7(f) (“The government may amend a bill of particulars subject to such conditions as justice requires.”); United States v. Salazar, 485 F.2d 1272, 1277 (2d Cir. 1973) (affirming district court’s acceptance of supplemental bill of particulars).¹

Very truly yours,

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cc: Clerk of the Court (BMC) (by ECF)

¹ The government also notes that, in order to streamline its case-in-chief, it is likely that prior to trial the government will elect not to proceed on certain violations and/or counts charged in the Indictment. The government will notify the defendant in a timely fashion of any violations and/or charges on which it does not intend to proceed at trial.